

EXHIBIT A

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

**BRIAN WHITE,
Plaintiff,**

v.

**BROKER SOLUTIONS, INC. d/b/a
NEW AMERICAN FUNDING and
PROCTOR FINANCIAL, INC.,
Defendants.**

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CIVIL ACTION NO. 4:20-cv-02080

JURY

PLAINTIFF'S DESIGNATION OF EXPERT WITNESSES

TO THE HONORABLE JUDGES OF THIS COURT:

Comes now, **Brian White** ("Plaintiff"), and files Plaintiff's Designation of Expert Witnesses as follows:

These expert witnesses are not retained by Plaintiff but may provide testimony in this case regarding attorney fees:

Brian White
c/o Clint Reed
White Harrison – Trial Lawyers
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Houston, Texas 77005
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Plaintiff reserves the right to supplement within the time limitations provided by the Court, or alterations thereto, or by any agreements between the parties.

Plaintiff further reserves the right to withdraw the designation of any expert and to aver positively that such previously designated expert will not be called upon to testify as an expert at trial, and to re-designate same as a consulting expert, who cannot be called by opposing counsel.

Plaintiff reserves the right to elicit by cross-examination the opinion testimony of experts designated and called by other parties to the suit.

Plaintiff reserves the right to call undesignated experts in rebuttal, whose identities and testimony cannot be reasonably foreseen until Defendant has presented their evidence at trial.

Plaintiff reserves the right to elicit expert testimony and/or lay opinion testimony that would assist the jury in determining material fact issues that would not violate the Federal Rules of Civil Procedure and/or the Federal Rules of Evidence.

Plaintiff further reserves any additional rights it may have regarding expert witnesses under the Federal Rules of Civil Procedure, Federal Rules of Evidence, and/or any other case law or rulings of this Honorable Court.

Respectfully submitted,

/s/ Clint Reed

Clint Reed

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing instrument has been served electronically upon all counsel of record, on this the 16th day of April 2021 as follows:

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/s/ Clint R. Reed

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